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Attorney for defendant
Francisco Cornejo-Quezada

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

FRANCISCO CORNEJO-QUEZADA,
SHAWN ERIC MORALES, SR., and
RENEE MICHELE HERMANN,

Defendants.

CASE NO. 2:24-CR-304-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: February 27, 2025
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is set for a status conference on February 27, 2025.
2. Counsel for Mr. Morales, Sr., Mark J. Reichel, Esq., substituted into this matter on, or about, February 12, 2025 (ECF51).
3. By this stipulation, defendants now move to continue the status conference until April 3, 2025, and to exclude time between February 27, 2025, and **April 3, 2025**, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
4. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has produced discovery in this matter, to date, consisting of 583 pages of investigative reports, photographs, native files (video/audio recordings and surveillance)

1 and text messages. The government has indicated additional discovery is forthcoming.

2 b) Counsel for defendants have met with their clients to discuss their respective
3 cases. Defense counsel desire additional time to conduct investigation into the charges, the
4 alleged roles of their respective clients, and to review discovery in this case. Defense counsel
5 will need additional time to discuss potential resolutions with their clients, prepare pretrial
6 motions, and otherwise prepare for trial.

7 c) Counsel for defendants believe that failure to grant the above-requested
8 continuance would deny them the reasonable time necessary for effective preparation, taking into
9 account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested outweigh the interest of the public and the defendant in a trial within the
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
15 et seq., within which trial must commence, the time period of February 27, 2025 to April 3,
16 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
17 T4] because it results from a continuance granted by the Court at defendant's request on the basis
18 of the Court's finding that the ends of justice served by taking such action outweigh the best
19 interest of the public and the defendant in a speedy trial.

20 5. Nothing in this stipulation and order shall preclude a finding that other provisions of the
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
22 must commence.

23 IT IS SO STIPULATED.

24
25 *[Signatures continue on following page.]*
26
27
28

1 Dated: February 19, 2025

/s/ JOHN R. MANNING

JOHN R. MANNING

Counsel for Defendant

FRANCISCO CORNEJO-

QUEZADA

5 Dated: February 19, 2025

/s/ MARK J. REICHEL

MARK J. REICHEL

Counsel for Defendant

SHAWN E. MORALES, Sr.

8 Dated: February 19, 2025

/s/ MICHAEL D. LONG

MICHAEL D. LONG

Counsel for Defendant

RENEE M. HERMANN

12 Dated: February 19, 2025

MICHELE BECKWITH

Acting United States Attorney

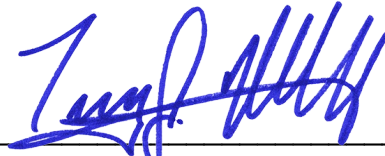
/s/ EMILY G. SAUVAGEAU

EMILY G. SAUVAGEAU

Assistant United States Attorney

ORDER

IT IS SO FOUND AND ORDERED this 20th day of February, 2025.



Troy L. Nunley
Chief United States District Judge